ROBINS, KAPLAN, MILLER & CIRESI LLP

800 LASALLE AVENUE 2800 LASALLE PLAZA MINNEAPOLLS, MN 55402-2015 TEL: 612-349-8500 FAX: 612-339-4181 www.rkmc.com

ATTORNEYS AT LAW

RYAN M. SCHULTZ rmschultz@rkmc.com 612-349-8408

January 2, 2015

VIA E-MAIL

The Honorable Hildy Bowbeer Magistrate Judge, U.S. District Court 632 Federal Building 316 North Robert Street St. Paul, MN 55101

Re: Skky v. Manwin USA, Inc. and Manwin Holding s.a.r.l. (13-cv-2086); Skky v. Playboy Enterprises, Inc. (13-cv-2089)

Dear Magistrate Bowbeer:

In accordance with the Court's Order on December 19, 2014, the parties provide their respective list of discovery disputes to be resolved at the teleconference on January 9, 2015. The parties will continue to discuss the issues during the week to further narrow the issues to be raised at the teleconference.

Plaintiff Skky, Inc.'s List of Issues as to Defendants Manwin and Playboy:

• Failure to provide date certain for Rule 30(b)(6) deposition and individual deponents

<u>Defendants' Manwin and Playboy List of Issues as to Skky's Discovery Responses:</u>

- Date for exchange of privilege logs; and
- Skky's failure to produce federal and state tax returns and SEC filings from 2001 to 2008.

ATLANTA BOSTON LOS ANGELES MINNEAPOLIS NAPLES NEW YORK

CASE 0:13-cv-02086-PJS-HB Document 189 Filed 01/02/15 Page 2 of 2

Hon. Hildy Bowbeer January 2, 2015 Page 2

In addition to the issues identified above, the parties are more than willing to discuss any other case management issues the Court would like to address at the teleconference.

Respectfully submitted,

Ryan M. Schultz Counsel for Skky, Inc.

/s/ Tamany Vinson Bentz (with permission)

Tamany Vinson Bentz Counsel for Defendants